

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFF'S OBJECTIONS TO CROSS NOTICE OF VIDEO DEPOSITION OF RON  
HORTON**

Plaintiffs object to Ethicon, Inc., and Johnson & Johnson's Cross Notice to Take Video Deposition of Ron Horton as follows:

1.

Plaintiffs object to the Cross Notice to Take Video Deposition of Ron Horton as it violates Federal Rule of Civil Procedure 30(b)(1), which requires reasonable notice to every other party. Plaintiffs received the Cross Notice less than 42 hours prior to the scheduled deposition, which is insufficient time for a representative from the MDL to prepare for and travel to the deposition location in Morristown, New Jersey.

2.

Plaintiffs object to the Cross Notice to Take Video Deposition of Ron Horton as it does not clearly state the deponent's name in violation of Federal Rule of Civil Procedure 30(b)(1). The caption of the cross notice states that the deponent is Ron Horton, while the main body of the cross notice states that the deponent is Michael Hulse, M.D. It is unclear to the Plaintiffs if the deponent is Ron Horton, Michael Hulse, M.D., or both.

This 30<sup>th</sup> day of June, 2015.

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Thomas P. Cartmell

THOMAS P. CARTMELL  
Wagstaff & Cartmell LLP  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
816-701-1100  
Fax 816-531-2372  
tcartmell@wcllp.com

D. RENEE BAGGETT  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
Rbaggett@awkolaw.com  
*Plaintiffs' Co-Lead Counsel*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2015, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

**PLAINTIFFS' CO-LEAD COUNSEL**

By: \_\_\_\_\_/s/Thomas P. Cartmell  
THOMAS P. CARTMELL  
Wagstaff & Cartmell LLP  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
816-701-1100  
Fax 816-531-2372  
[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)